

Exhibit D
(PREVIOUSLY
Filed Under Seal)

8/27/2024

VirtaMove Corp. v. Amazon.com, Inc., et al Susan Cameron 30(b)(6)

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

_____)	
VIRTAMOVE, CORP.,)	
Plaintiff,)	
)	Case Number:
V.)	7:24-CV-00030
)	
AMAZON.COM, INC.; AMAZON.COM)	
SERVICES LLC; and AMAZON WEB)	
SERVICES, INC.,)	
Defendants.)	
_____)	

30 (b) (6) DEPOSITION OF SUSAN CAMERON
ON BEHALF OF VIRTAMOVE, CORP.

August 27, 2024

11:02 a.m. Eastern Daylight Time

Reported by: Lori J. Goodin, RPR, CRR, RSA,
California CSR #13959

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 REMOTE APPEARANCES:

2

3 FOR PLAINTIFF:

4 RUSS AUGUST & KABAT

5 BY: PETER TONG, ESQUIRE

6 4925 Greenville Avenue, Suite 200

7 Dallas, Texas 75206

8 310-826-7474

9 ptong@raklaw.com

10

11

12 FOR DEFENDANTS:

13 KNOBBE MARTENS OLSON & BEAR LLP

BY: JEREMY ANAPOL, ESQUIRE

14 2040 Main Street, 14th Floor

Irvine, California 92614

15 949-760-0404

jeremy.anapol@knobbe.com

16

17

18 Also Present:

19 Billy Fahnert, Videographer/Document Tech

20

21

22

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1 Russ, August & Kabat on behalf of VirtaMove
2 Corporation.

3 MR. ANAPOL: Jeremy Anapol of Knobbe
4 Martens Olson & Bear on behalf of defendants.

5 * * *

6 Whereupon,

7 SUSAN CAMERON,

8 a witness called for examination, having been
9 first duly sworn, was examined and testified as
10 follows:

11 * * *

12 EXAMINATION

13 BY MR. ANAPOL:

14 Q. Good morning, Ms. Cameron. How are
15 you today?

16 A. Good morning. Good. Thank you.

17 Q. So, my name is Jeremy, and I will be
18 taking your deposition today.

19 Have you been deposed before?

20 A. No.

21 Q. Okay. So, it is just basically a
22 series of questions and answers. They are being

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1 privilege and not give me the information
2 that goes on the privilege log.

3 Who is involved, the general subject
4 matter of the communication, when the
5 communication occurred.

6 Are you are refusing to give me that
7 information for all of these communications
8 that you are asserting privilege over?

9 MR. TONG: Lumenci is providing
10 nontestifying consultancy services in this
11 case.

12 Unless there is a rule that requires
13 us to disclose our nontestifying experts and
14 consultants, Lumenci information will be
15 withheld.

16 MR. ANAPOL: Well, the rule that
17 requires you to disclose it is Rule 26,
18 unless you have a valid claim of privilege.

19 And if you are asserting privilege,
20 then you need to provide information to allow
21 us to evaluate the propriety of that
22 assertion which includes who was involved,

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1 the general subject matter, and when the
2 communication occurred.

3 MR. TONG: Which part of Rule 26?

4 MR. ANAPOL: The part that says
5 relevant information is discoverable.

6 MR. TONG: So, I'm going to continue
7 asserting privilege at this time over Lumenci
8 on the basis of privilege. They are
9 nontestifying experts.

10 I don't think that information needs
11 to be disclosed.

12 MR. ANAPOL: And when did Lumenci
13 get retained as nontestifying consultants?

14 MR. TONG: I am maintaining
15 privilege over that information as well.
16 They do not have any nonprivileged work that
17 we are willing to disclose.

18 MR. ANAPOL: And you are not willing
19 to tell me when you retained them, allegedly
20 as nontestifying consultants, in this case?

21 MR. TONG: They are nontestifying --
22 sorry. When we allegedly retained them, we

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1 answer. I will give you a chance to
2 rephrase.

3 THE WITNESS: I won't answer that
4 question.

5 BY MR. ANAPOL:

6 Q. Does VirtaMove have any attorneys
7 other than Russ, August & Kabat that represent
8 them in this case?

9 A. No.

10 Q. When did VirtaMove retain Russ,
11 August & Kabat?

12 MR. TONG: Objection, vague. You
13 can provide a month and year only, if you
14 understand the question.

15 THE WITNESS: I believe it was
16 August of 2023.

17 BY MR. ANAPOL:

18 Q. And in those communications you
19 mentioned with Lumenci, did Randy Taylor
20 participate in those communications?

21 MR. TONG: Objection, foundation.
22 Vague. Calls for privileged information.

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1 Q. Okay. And you think that is in your
2 e-mails, probably?

3 A. Yes. There or it was a letter and
4 I've got a soft copy of it. Something.

5 Q. Okay. Has VirtaMove ever licensed
6 the asserted patents to anybody?

7 A. No, not to my knowledge.

8 Q. Has VirtaMove ever offered a license
9 to anybody?

10 A. Not to my knowledge.

11 Q. So, the last topic that you were
12 asked to prepare for is Topic Number 12, "The
13 identities and locations of all persons at
14 VirtaMove or its predecessors who would have been
15 responsible for patent licensing, negotiations,
16 at any time from the issuance of the patents in
17 suit until this lawsuit was filed."

18 Did you prepare to testify on that
19 topic?

20 MR. TONG: Objection. Scope and
21 foundation.

22 THE WITNESS: I prepared as best I

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1 CERTIFICATE OF NOTARY

2 I, LORI J. GOODIN, RPR, CRR,
CA CSR # 13959 the Notary for this deposition, do
3 hereby certify that the witness whose testimony
appears in the foregoing deposition was sworn by
4 me; that I am neither counsel for, related to,
nor employed by any of the parties to the action
5 in which this deposition was taken; and, further, that I am
not a relative or employee of any attorney or
6 counsel employed by the parties hereto, or
financially or otherwise interested in the
7 outcome of this action.

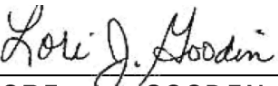
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LORI J. GOODIN, RPR, CLR, CRR
Notary Public in and for:

13

STATE OF FLORIDA, COUNTY OF SARASOTA

Notary Commission Number: GG987804

14

My Commission expires: May 12, 2028

STATE OF CALIFORNIA, CA CSR# 13959

15

My Commission expires: February 22, 2025

STATE OF MARYLAND, COUNTY OF ANNE ARUNDEL

16

My Commission expires: August 2, 2025

17

DISTRICT OF COLUMBIA, WASHINGTON DC

18

My Commission expires: June 1, 2026

19

STATE OF DELAWARE: COUNTY OF KENT

20

My Commission expires: September 9, 2025

21

STATE OF PENNSYLVANIA, COUNTY OF LEHIGH

22

My Commission expires: April 5, 2025